98 SEP 28 AM 10: 20

September 19, 1998

U.S. Department of Transportation Dockets Docket No. FAA-98-4390 – 5 400 Seventh St., SW Rm Plaza 401 Washington, DC 20590

I read with great interest Notice of Proposed Rulemaking, Docket No. FAA-98-4390; Notice No. 98-12. This action is long overdue. It is refreshing to see the FAA recognize the unique characteristics of helicopter operations.

The rule will provide the helicopter industry an increased level of safety and productivity. Encouragement to use the IFR system will reduce flights in marginal VFR conditions and reduce helicopter weather related accidents. The rule encourages further development of additional unique IFR helicopter procedures.

The rule also provides the catalyst to review rules such as Section 135.223 of title 14 of the Code of Federal Regulations. I believe this rule should be the beginning of changes in the way helicopters are allowed to operate within the air traffic system.

I applaud the positive thinking of the FAA and strongly support this rule.

Sincerely,

Clark Kurschner

Director of Operations